



: C.-S.-S.-C.-P.-S.-G.-P. FLAG OF THIS DOCUMENT-POSTAL-VESSEL-COURT-VENUE.

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

James-Brent: Alvarez.
an individual,

v.

Luke Sitts, an individual;
Geri Brooks, an individual;
Scott Geeting, an individual;
Steven Barrett, and individual;
Don Morris, an individual;
Matthew Carmichael, an individual;
Michael H. Schill, an individual,

Defendants.

Case No.: 6:19-cv-01071-AA

PLAINTIFF'S MOTION FOR A SECOND
EXTENSION OF TIME TO STATE HIS
OBJECTIONS TO THE COURTS' SECOND
OPINION AND ORDER

LR 7-1 CERTIFICATION

Plaintiff certifies that he has conferenced with counsel for defendants—Luke Sitts, Geri Brooks, Scott Geeting, Steven Barrett, Don Morris, Matthew Carmichael, and Michael H. Schill, by email on October, 8, 2020, in regards to the matters scribed herein, and council for defendants were not able to provide a response without twenty-four (24) hour notice.

MOTION

In accordance with Fed. R. of Civ. P. 6(b), and without waiver of any rights, plaintiff, respectfully, moves the Court for an order extending the deadline a second time to file an objection and a response to the Court's Opinion and Order (ECF No. 64) filed August 25, 2020.

MEMORANDUM

On August 25, 2020, the Court ordered and Opinion and Order granting defendants' motion to dismiss plaintiffs' second amended complaint and denying plaintiff's motion to file a third amendment complaint. (ECF No. 64.) On September 24, 2020, plaintiff filed a request for an extension of time to state his Objections to the Court's Opinion and Order (ECF No. 67.) and on September 25, 2020 the Court, most graciously, extended the plaintiff time.

Plaintiff has made good use of the time the Court has granted him. Settling one of the eight cases he was litigating and claiming victory in another. Furthermore, plaintiff is nearly finished with this Motion for Review (his objections) for consideration of leave to amend his complaint, and further, provided himself with the time to finish.

However, due to weather (mold has set in), plaintiffs' schedule changed and he has had to begin fulfilling his obligation to contracts by starting work on October 7, 2020, instead of October 10, 2020, as previously planned. The plaintiff worked nearly all day and night on October 7, 2020, from the moment he arose until 4:00am, and has to continue to work 18 hour days on October 8 and 9, 2020. This is because he is helping the cannabis farmers harvest their crops, and has been waiting the entire year for this opportunity. He has been with out work the entire year, and has been waiting for this opportunity to fulfill his obligations to contracts.

Plaintiff will have time to finish his Motion for Review to the Court's Second Opinion over the weekend, because the crops will be brought down and drying for harvest. Plaintiff, respectfully, begs the Court for a four (4) day extension of time to finish his Motion for Review, that would move the deadline from October 8, 2020, to October 12, 2020. This motion is neither opposed or unopposed because as noted above, council did not have enough time to confer with their clients due to the short notice on the plaintiff's behalf.

May the Court note, that the plaintiff is currently working around the clock (night and day), with limited breaks and sleep, and thereby, made contact with the defendants as time permitted. Furthermore, this motion is made in good faith and not for the purpose of delay, as the matters scribed above was out of the plaintiff's control.

DATED this 8th day of October, 2020.

THE PLAINTIFF

s/James-Brent: Alvarez UCC 1-308

James-Brent: Alvarez

c/o 30924 Kenady Lane

Cottage Grove, Oregon [97424]

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Plaintiff's motion for a second extension of time to respond to the Court's second Opinion and Order on:

Namoi Levelle Haslitt, OSB No. 075857
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Attorneys for Defendants
Luke Sitts, et al.

by the following indicated method of service set forth below:

Email: as agreed on by all parties involved during the Covid-19 situation, until either party terminates the agreement.

DATED this 8th day of October, 2020.

s/James-Brent: Alvarez UCC 1-308
James-Brent: Alvarez
c/o 30924 Kenady Lane
Cottage Grove, Oregon [97424]